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**EX PARTE OR LATE FILED**

March 19, 1998

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Magalie R. Salas, Secretary  
Federal Communications Commission  
1919 M Street, NW, Room 222  
Washington, DC 20554

Re: **EX PARTE PRESENTATION** – Docket Nos. CCB/CPD 97-24; CC 96-98; CC 95-185/E-98-08; E-98-10; E-98-13; and E-98-14 through 18

Dear Ms. Salas:

Please take notice that yesterday, March 18, 1998, David Gamble, Vice President, Regulatory Affairs, of Paging Network, Inc. ("PageNet"), Bill Wiginton, Director of Interconnection for PageNet, Vaughn Bowden, Director of Systems and Technology for PageNet, Judith St. Ledger-Roty with Kelley Drye & Warren LLP, and the undersigned, met with Paul Gallant, legal advisor to Commissioner Tristani. No written presentations were left with Mr. Gallant. However, the attachments reflect the diagrams that were drawn during the meeting to support PageNet's presentation.

At the meeting, we provided Mr. Gallant with an overview of the operation of the PageNet paging network and the functions performed by the PageNet switching equipment in accepting, processing, and terminating a call originated on the network of an incumbent local exchange carrier ("LEC"). PageNet's representatives explained how the PageNet system has evolved to incorporate efficiencies that benefit both its own network as well as the public switched telephone network. In addition, we explained to Mr. Gallant PageNet's position that the arguments raised by some parties in the above-captioned proceedings regarding the alleged burden placed on LECs if the current Commission rules are permitted to stand are without merit. In sum, PageNet explained that the example raised by SBC Communications involving a paging point of interconnection ("POI") in Eureka, California, was contrived because paging carriers have strong economic and efficiency incentives separate and apart from the Commission's interconnection rules to locate their switching equipment or POIs in or near urban centers. Moreover, PageNet explained that LECs would still stand to receive considerable net revenues after paying reciprocal compensation and providing the facilities to carry LEC-originated traffic to the POI even in the extremely unlikely event that the POI were located far outside an urban

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area. PageNet also generally reiterated the need of paging carriers for fair and reasonable interconnection.

In accordance with Section 1.1206 of the Commission's Rules, we are filing an original and two copies of this notice of *ex parte* presentation. Two additional copies have been provided for filing in each of the above-referenced proceedings. If there are any questions concerning this notice, please do not hesitate to contact the undersigned or Ms. St. Ledger-Roty.

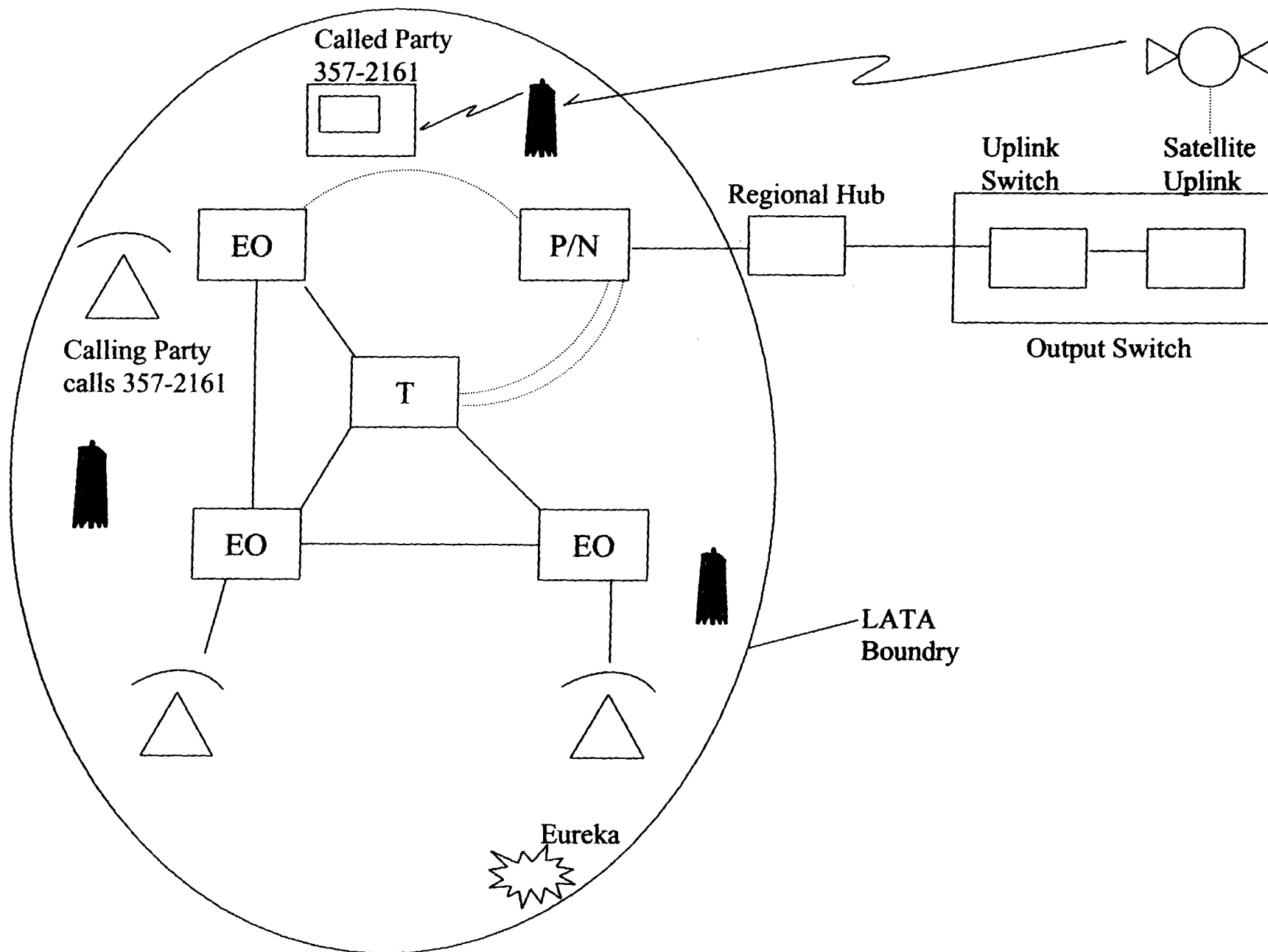
Respectfully submitted,



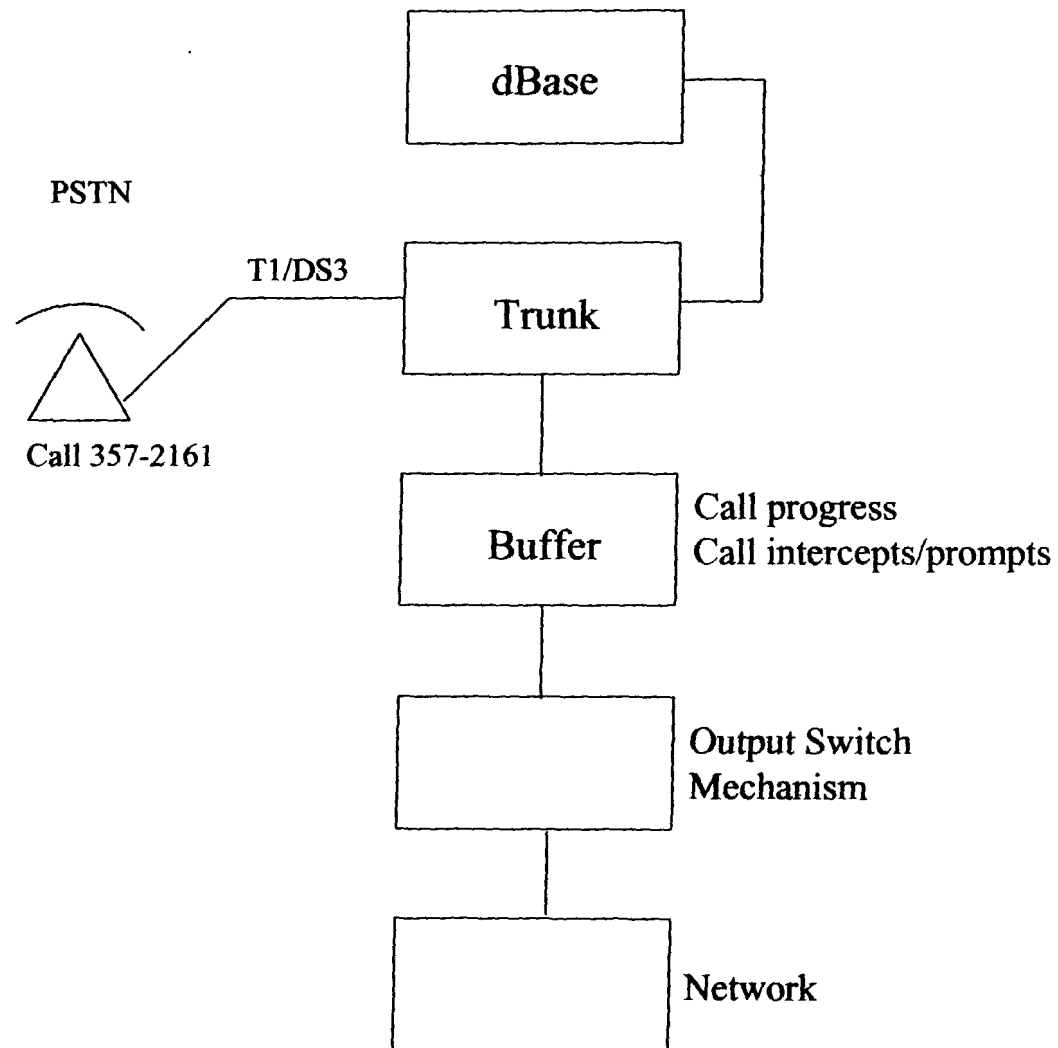
Edward A. Yorkgitis, Jr.  
Attorney for Paging Network, Inc.

Enclosure

## Schematic of PageNet-LEC Interconnection

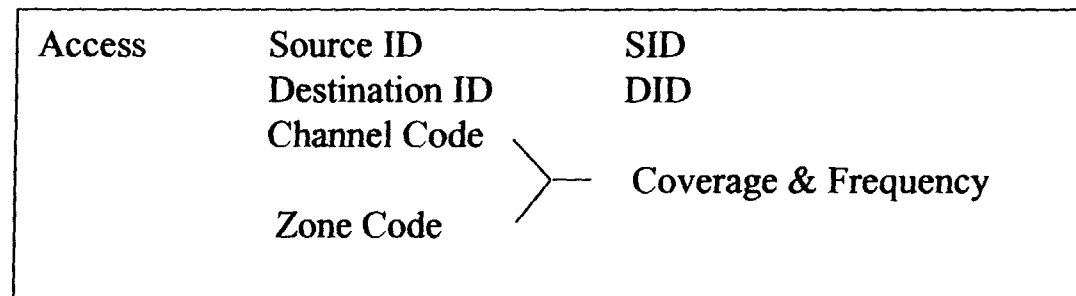
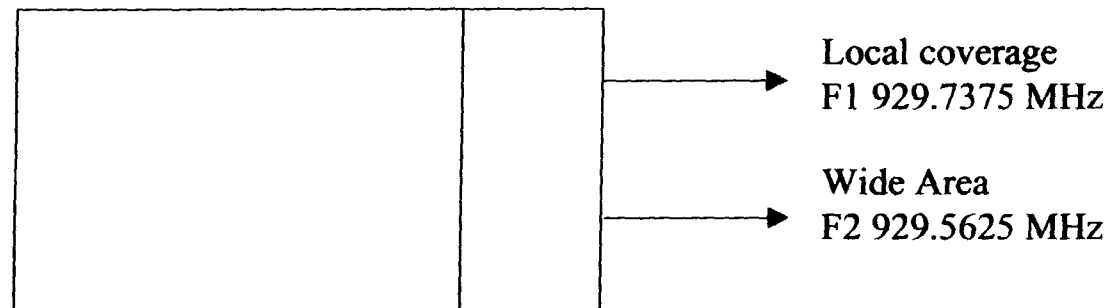


## Placing Call over PageNet System



1. Check dBase
2. Check to verify that we can complete call to the end device (sends intercept to calling party if not)
3. Accept the call; answer supervision to CO
4. Play tone or prompt to start gathering message
5. Calling party leaves message
6. Output switch forwards message
7. Play acceptance sequence
8. Start disconnect sequence; release call
9. Send busy

## Centralized Output Switch - manages use of transmitters



## LEC Revenue Example

60 pages/month per pager

35 business pages per month (at 0.04 dollars per call)

15 calls back (at 0.04 dollars per call)

$$\begin{array}{rcl} & 50 \text{ calls per month} & \\ \times & 0.04 \text{ dollars per call} & \\ \times & 3 \text{ million pagers in Bay area} & \\ \hline = & \$6 \text{ million/mo. revenues to ILECs in Bay Area.} & \end{array}$$

$$\begin{array}{rcl} & \$0.0156 \text{ per call (termination compensation)} & \\ \times & 60 \text{ calls per pager} & \\ \times & 3 \text{ million pagers} & \\ \hline \sim & \$288,000 \text{ in termination compensation/mo.} & \end{array}$$